



May 12, 2015  
Project No. G150326EPA

Mr. Richard Brown  
EHS Coordinator  
TES Filer City Station  
700 Mee Street  
Filer City, MI 49634

Re: Response to Recent EPA 114 Request - PM10 Monitoring

Dear Mr. Brown:

In response to the recent U.S. Environmental Protection Agency (USEPA) 114 Request letter dated March 13, 2015, I propose the following language to address Paragraphs 5 through 19 contained within USEPA's letter. This response was developed after reviewing the specific regulatory citations contained within the 114 request, the site survey performed on April 28, 2015 with TES Filer City staff, and my past experience performing an SO<sub>2</sub> ambient monitoring study for the original TES Filer City PSD permit back in the mid-1980s. During the April 2015 site review, Richard Brown, EHS Coordinator of TES Filer City Station, and I walked the entire TES site and mutually determined that there was not a single, reasonable location to build a PM<sub>10</sub> monitoring station as item 5 & 6 of EPA's letter sets forth, nor site a MET tower that would record representative wind speed and directional data, as requested in item 15.

### **MET Tower Installation - Site Validation Issues**

Specific to the MET tower location, the attached site map identifies the radial area which is within 10X of the highest onsite wind obstruction. You will note that because of the relatively small site footprint, there is no location on the TES property that can meet the EPA (MET tower) siting criteria as noted in the *"Quality Assurance Handbook for Air Pollution Measurement Systems Volume IV: Meteorological Measurements Version 2.0"* as noted in the 114 request.

### **PM<sub>10</sub> Monitoring – Site Validation Issues**

With respect to the siting of the PM<sub>10</sub> monitoring equipment, not only is the entire TES site invalid because representative MET data cannot be gathered, but the existence of on-site roadways, building dimensions/locations and the trees bordering Manistee Lake, result in far too many obstructions that only serve to invalidate any monitored PM<sub>10</sub> results. I would consider this entire site inappropriate to meet the intent of the 40 CFR Part 58, Appendix E requirements. Furthermore, the location of the Coal and Pet Coke storage areas is surrounded on roughly three (3) sides by water with a narrow area around the pile for coal handling equipment and eliminates all of that area as a possible PM<sub>10</sub> monitoring location.

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## Conclusions

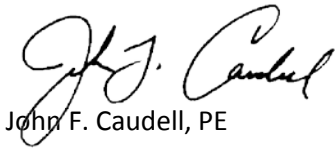
Based on my past ambient monitoring experience for the original PSD permitting of this facility, and my recent site review with TES staff, it is my opinion that the entire site is invalid for the siting, installation and operation of a PM10 monitoring and representative MET station.

1. Manistee Lake borders approximately 40% of the TES property line and nearly 75% of the Coal/Pet Coke storage area
2. There are no available locations on site that meet the required minimum set-back distances from plant roadways, trees, and/or large structures.
3. Based on the MET Tower siting restrictions consistent with Figure 2.5 of the *"Quality Assurance Handbook for Air Pollution Measurement Systems Volume IV: Meteorological Measurements Version 2.0"*, there is no onsite location for installation and operation of a MET station to record representative wind speed and direction data for correlation of any on-site PM10 monitored results.

If you have any questions or require additional information, please contact me at 517.887.4024 or [jfcaudell@ftch.com](mailto:jfcaudell@ftch.com).

Sincerely,

FISHBECK, THOMPSON, CARR & HUBER, INC.



John F. Caudell, PE

pmb  
By email